

## **Canby Telephone Association dba DirectLink Privacy Policy**

DirectLink is committed to respecting the privacy of our customers. We strive to provide a safe, secure customer experience. This privacy statement sets forth the privacy policy that applies to DirectLink and its customers.

Telephone account information is referred to by the FCC as Customer Proprietary Network Information (CPNI). Under Federal law, DirectLink has a duty to protect the confidentiality of your telecommunications service information.

DirectLink discloses information if legally required to do so, if requested to do so by a governmental entity or if we believe in good faith that such action is necessary to (a) conform to legal requirements or comply with legal process; (b) protect our rights or rights or property or our affiliated companies; (c) prevent a crime or protect national security; or (d) protect the personal safety of users or the public.

Your data will be stored and processed in the United States. The information we gather at DirectLink will not be shared outside of the Company unless necessary to make improvements to our products and services through the use of consultants and vendors who will be contractually obligated to not further share this information.

DirectLink's web-site may contain links to other web-sites over which we have not control. We are not responsible for the privacy policies or practices of other web-sites to which you choose to link from our sites. We encourage you to review the privacy policies of those other web-sites so that you can understand the privacy of that web-site.

DirectLink may request that you provide personal information, including your name, address, e-mail address, telephone number, credit card number, social security number, contact information, billing information and any other information from which your identity is discernible.

We also gather or may gather certain information about your use of DirectLink products and services. There is also information about your computer hardware and software that is or may be collected by us. This information can include without limitation your IP address, browser type, domain names, access times and referring web-site addresses.

## **Our Use of Your Information**

DirectLink uses the information we gather from you or when you visit our web-site, whether personal, demographic, collective or technical, for the purpose of operating and improving our service to you and notifying you of the products and services associated with providing you telephone service that we offer.

DirectLink may use your contact information in order to send you e-mail or other communications regarding updates at our web-site that relate to your telephone service or products or services related to our telephone service.

DirectLink does not disclose your personal information to third parties, or your combined personal and demographic information

DirectLink discloses information to companies and individuals we retain to perform functions on our behalf, such as consultants or vendors and help maintain our telephone service. For example, third parties that host our web servers that analyze data or that process credit card payments. These third parties will have access to your personal information as necessary to perform their functions that aid DirectLink's ability to provide telephone service, but they may not share that information with any other third party.

DirectLink may disclose and transfer information to a third party who acquires all or a substantial portion of our business, whether such acquisition is by way of merger, consolidation or purchase of all or substantial portion of our assets.

You may review, correct, update or change your customer information at any time.

DirectLink has put in place measures designed to secure you personal information from accident, loss and from unauthorized access, use, alteration or disclosure.

If DirectLink decides to materially change our privacy statement for DirectLink, we will post those changes through a prominent notice in the DirectLink.coop web-site so that you will always know what information is being gathered and how that information might be used.

If at any time you have questions or concerns about this privacy statement or believe that we have not adhered to this privacy statement, please feel free to call us 503.266.8111 and speak to one of our representatives. DirectLink's representatives will promptly answer your question or resolve your problem.